

## Comments in Response to Localism Notice of Proposed Rulemaking MB Docket No. 04-233

I submit the following comments in response to the Localism Notice of Proposed Rulemaking (the "NPRM"), released Jan. 24, 2008, in MB Docket No. 04-233.

Many of the proposals in NPRM, contrary to the FCC's stated objectives, would harm both localism and diversity of viewpoints.

WNWN 1560 "The Touch" possesses the ability to serve our community in a unique way by offering specialized programming (such as religious services and special weekend news-talk shows). Our station also serves as an important gateway for new entrants seeking business opportunities in broadcasting – increasing ownership among those traditionally underrepresented.

It is my sincerest hope that the Commission will not force WNWN 1560 "The Touch" to establish our studio in the community that holds our license (Portage MI). The outcome would be disastrous in that our station which primarily serves Kalamazoo, would have to divert our extremely limited financial resources from supporting and enhancing quality programming to covering additional real estate costs and it would move us further away from our core listeners.

Another one of these ill-advised proposals would force radio stations to curtail reliance on labor-saving technology. An end to unstaffed operations will not improve responsiveness to a local community. To the contrary, it will likely lead stations to broadcast fewer hours or shut down altogether. Unattended operation with proper safeguards has helped small stations provide more service through efficiency. Take that away, and the Commission will create strong disincentive for stations to stay on during the late evening or early morning hours, hours during which very little revenue is generated. The increased operational costs will lead new entrepreneurs, including women and minorities, to look elsewhere to invest their savings and sweat equity.

The measures that NPRM proposes would substantially raise costs. The response to these regulations could be cutbacks or station closures. Neither of these courses of action is in the public interest.

Smaller stations are keenly attuned to the communities they serve – it is how they remain in business. But the balance is delicate, and the Commission must not take action that will tip the balance so stations cut back on service or drop out. There is no 'public interest' in service that is both diminished and less diverse.

Respectfully submitted,

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April 28, 2008  
Date

Signature

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